

# memorandum

Rocky Flats Office



000020149

DATE: DEC 10 1991

REPLY TO  
ATTN OF: ERD:SG:10761

SUBJECT: OU2 Subsurface Interim Measure (IM) Schedule

TO: A. Rampertaap, EM-453, HQ

Attached is a copy of the December 5, 1991, letter from EPA and CDH concerning the IM schedule. We submitted a proposed schedule to EPA and CDH which included HQ review times as per the October 25, 1991, Whitfield memo. Our proposed schedule was approved "...with modification...." Although the schedule for the initial Draft IM plan included times for HQ review and approval, EPA/CDH modified the remainder of the schedule omitting timeframes for HQ review and approval.

We are asking for guidance on this issue. We see two alternatives, accept the modified schedules, or invoke dispute resolution on two issues: (1) Headquarters review time and (2) EPA/CDH setting schedules for us that we do not agree with.

If dispute resolution is an option, you should be aware that the deadline for initiation of dispute resolution is December 19, 1991 (two week time period). In order to meet this deadline, we will need your guidance by December 16, 1991.

Please contact me or Scott Grace of my staff at FTS 345-7199 if you have any questions.

*for Scott R. Grace*  
Frazer R. Lockhart  
Director  
Environmental Restoration Division

Attachment

cc w/attach:  
R. Greenberg, EM-45  
C. Magnuson, EM-431  
P. Bunge, EG&G/RF

A-OU02-000858

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